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1990-1999

LOUIS J. GALLO 1919 - 2015

July 24, 2020

## By Fax 585-613-4325 and Hand Delivery

Hon. Elizabeth A. Wolford
United States District Court
for the Western District of New York
Keating Federal Building
100 State Street
Rochester, NY 14614

Re:

Holly Parks, as Administrator of the Estate of her daughter

Heather Roselli v. Sandra Abdo, et al. Civil Action No.: 20-cv-6384 – EAW

Dear Judge Wolford:

Please be advised that we were retained by Sandra Abdo, a Defendant in the above-referenced matter for the sole purpose of seeking a defense and indemnification from the State of New York.

On June 15, 2020, we served the State of New York with notice pursuant to New York State Public Officers Law §17 requesting that the State provide Ms. Abdo with a defense and indemnification in this matter.

On July 22, 2020, we learned that the State of New York will be allowing Ms. Abdo to select private counsel to represent her in this action and New York State will pay for said counsel.

Accordingly, we will be meeting with Ms. Abdo to discuss possible retention of Gallo & Iacovangelo.

We have discussed this matter with Counsel for the Plaintiff, and they have agreed to extend the time to answer or otherwise move with respect to the Complaint until August 12, 2020.

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Accordingly, we would ask the Court to so order the extension of time to Answer.

If you have any questions or concerns, please feel free to contact the undersigned.

We sincerely appreciate the Court's courtesies in this matter.

David D. Spoto

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cc: Ananda V. Burra, Esq. (aburra@ecbalaw.com)

So Ordered:

DATEI): 07/31/2020